

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

JOINT PROPOSED SCHEDULING ORDER AND DISCOVERY PLAN

COME NOW Plaintiff and Defendant, by and through their undersigned counsel of record, and propose the following Scheduling Order and Discovery Plan.

1. On October 22, 2019, information was exchanged between Michael S. Foster (counsel for Plaintiff) and David S. Baker (counsel for Defendant). As a result, the parties have agreed, subject to the approval of the Court, to the following Joint Proposed Scheduling Order and Discovery Plan.

2. By January 26, 2020, the parties shall provide each other with the information required by Fed. R. Civ. P. 26(a)(1).

3. The parties have agreed and recommend to the Court the following proposed Rule 16 Scheduling Order:

a. The proposed closing date for the joinder of parties shall be March 7, 2020. This date has been proposed because it will allow the parties sufficient time to engage in preliminary discovery to determine whether the addition of other parties is appropriate.

b. Any motion to amend the pleadings to add claims shall be filed on or before March 7, 2020. This date has been proposed because it will allow the parties sufficient

time to engage in preliminary discovery to determine whether additional claims are appropriate.

c. The parties propose all discovery motions be filed on or before August 4, 2020.

d. The parties propose dispositive motions be filed no later than September 6, 2020.

e. All other pretrial motions shall be filed no later than 15 days prior to the proposed date the case is set for trial by the Court.

f. The parties propose all pretrial discovery be completed on or before August 4, 2020.

4. The parties have agreed and recommend to the Court the following proposed scheduling regarding identification and depositions of expert witnesses:

a. The parties propose Plaintiff identify his expert witnesses and provide the information required by Fed. R. Civ. P. 26 on or before May 19, 2020.

b. The parties propose Defendant identify his expert witnesses and provide the information required by Fed. R. Civ. P. 26 on or before July 6, 2020.

5. The parties do anticipate discovery with regard to electronically stored information.

6. The parties anticipate this case will take approximately three (3) days to try.

7. The parties propose it would be appropriate to set this case for trial at some point after December 20, 2020.

8. The parties anticipate it may be appropriate to seek issuance of a Protective Order with regard to anticipated discovery in the areas of personnel files, training records, internal policies and procedures of law enforcement agencies, trade secrets, and medical records. In

accordance with Local Rule 16.1(f)(7), any party who anticipates requesting a protective order shall serve on every other party a proposed protective order and proposed stipulation for its entry before it is submitted to the Court for consideration.

9. The parties have demanded a trial by jury.

Respectfully submitted,

/s/ Michael S. Foster

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